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July 29, 2008

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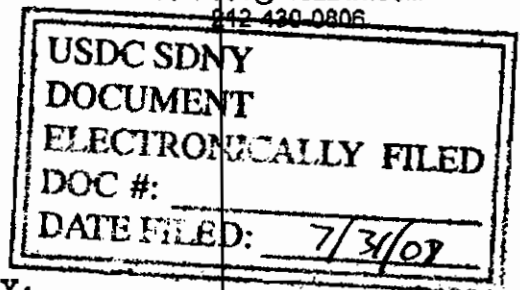
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Hon. Denny Chin  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1020  
New York, New York 10007



American Home Assurance Co. v.  
Re: Delta Air Lines, et al.  
Docket No. 07 CV 6219 (DC)  
Our File: 5194

Dear Judge Chin:

The undersigned represents plaintiff American Home Assurance Co. in the above captioned matter. We write on consent and behalf of all counsel to respectfully request an additional sixty (60) day extension of discovery from August 28, 2008 to Monday, October 21, 2008.

The parties have been cooperating diligently to schedule depositions. This includes efforts to arrange depositions of two of plaintiff's witnesses who reside in Europe: Mr. Santiago Palanques and Mr. Yann Cardot.

Mr. Palanques was formerly employed by plaintiff's assured, Bristol-Myers Squibb (BMS), as its Plant Manager in Barcelona, Spain. Mr. Palanques has been unemployed since the plant was closed in April 2008. He has just gained new employment in Spain which requires him to begin work the day

GRANTED. The discovery cut-off  
is extended to Oct. 24, 2008.  
The PTC is adjourned to  
that date at 10 a.m.  
SO ORDERED. *[Signature]* 7/30/08

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before we intended to produce him in New York. We are trying to coordinate his deposition with that of Mr. Cardot, a current BMS employee, whose business schedule requires him outside the United States for the month of August. He is traveling to the United States the week of September 9 and we are arranging to produce him for a deposition that week in New York.

The additional time will allow the parties to facilitate these and other depositions necessary to complete discovery.

To that end, the parties jointly respectfully request that the discovery deadline be extended sixty (60) days from August 28 to Monday, October 27 2008.

Attached please find a proposed Amended Scheduling Order reflecting the above referenced dates. We thank the Court for its time and consideration of these requests.

Very truly yours,

KENNEDY LILLIS SCHMIDT & ENGLISH

By:

  
Thomas M. Grasso

TMG/

cc: BY EMAIL

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